

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE ESTATE OF YARON UNGAR by and through
its Administrator, DAVID STRACHMAN; DVIR
UNGAR, minor, by his guardians and next friends,
YISHAI UNGAR, minor, by his guardians and next
friends, PROFESSOR MEIR UNGAR, JUDITH
UNGAR, individually and in their capacity as legal
guardians of Plaintiffs DVIR UNGAR and YISHAI
UNGAR; RABBI URI DASBERG, and JUDITH
DASBERG, in their capacity as legal guardians of
Plaintiffs DVIR UNGAR and YISHAI UNGAR;
AMICHAH UNGAR; DAFNA UNGAR; and
MICHAEL COHEN,

Civil Action No. 07 CV 2572
(CM) (LMS)

**DECLARATION OF ROBERT
J. TOLCHIN, ESQ.**

Plaintiffs / Judgment-Creditors,

-against-

ORASCOM TELECOM HOLDING S.A.E.

Defendant / Garnishee.

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ROBERT J. TOLCHIN, pursuant to 28 U.S.C. § 1746, declares and states
as follows subject to the penalties for perjury of the United States of America:

1. I am an attorney licensed to practice law in the State of New York,
and am a member of the Bar of this Court. I am one of the attorneys representing the
plaintiffs herein, and am making this declaration in opposition to the defendant's
motion to dismiss.

A. Orascom Internet Mailing List

2. In mid-2006, I went to the internet website of the defendant Orascom Telecom Holding, S.A.E. ("Orascom"), <http://www.otelecom.com>, and signed up for Orascom's investor information mailing list. I used the email address "bobinnewyork@tolchinlaw.com."

3. Between September 5, 2006 and August 13, 2007, I received 46 emails from Orascom to this email address. Each of those emails alerted me to a new press release issued by Orascom with information of interest to investors.

B. Orascom Investor Conference Call Notification

4. In or about April 2007, I also asked a stock broker affiliated with CitiGroup to subscribe on my behalf to Orascom's conference call alert list. This is a list that Orascom utilizes to notify institutional investors of conference calls and other important information relating to Orascom. The broker forwarded to me 17 different emails he received from Orascom between April 9, 2007 and August 1, 2007.

C. List of Bond Investors

5. As counsel for the Ungars, I served a judgment enforcement subpoena on Credit Suisse, which acted as "book runner" for Orascom with respect to its sale of \$750 million of bonds in 2007. While Credit Suisse was able to provide us with the offering memorandum for that bond issue, Credit Suisse was not able to provide us with a list of purchasers of the bonds. Credit Suisse's counsel Mark Hanchet, Esq.

informed me during a telephone conversation that information as to who purchased the bonds would be in Orascom's possession.

Dated: New York, New York
August 15, 2007



ROBERT J. TOLCHIN